

**Exhibit A**  
*Summary of Responses and  
Production by the City of Detroit*

**DWSD Trustee and Ad Hoc Committee's Requests for Production and City's Responses\***  
(High Priority)

DWSD TRUSTEE & AD HOC COMMITTEE'S #	DWSD TRUSTEE AND AD HOC COMMITTEE'S PRODUCTION REQUEST	CITY RESPONSE	REVIEW OF DOCUMENTS	RELEVANCE
10	Most recent cost of services study done by the City for each of the Systems	Not aware of responsive documents	No documents provided	This will show the current rate design, how revenue is generated by class, and how costs are allocated. It will show whether DWSD is subsidizing retail consumers and show whether the Systems are losing revenue and long-term stability.
11	Average and median bills by customer rate class (including surrounding counties and cities)		No documents provided	This will provide an understanding of historical rates for the City and surrounding counties to complete a financial capacity analysis and determine the residential indicator.
13	Work by DWSD's rate consultant in conjunction with DWSD's Root Cause Committee's Final Report, dated as of March 13, 2013	POA00245352, POA00245393, POA00245432, POA00245468, POA00245504, POA00245542, POA00245582, POA00245620, POA00245656, POA00245693, POA00214164, POA00216881, POA00216883, POA00216877, POA00216884, POA0072756, POA00034480, POA00216881, POA00002851, POA00107044	POA 00034480 regards alternatives for the parking system. POA0072756 was withheld on the basis of privilege. The other documents include OHM's CIP and the Conway MacKenzie Presentation, which were previously provided. No outside rate consultant studies are included.	This will provide information related to labor projections and optimum workforce and identify areas of excess capacity. It will provide information related to capital expenditures and allow experts to prepare an efficiency study and more accurate financial analysis.
14	Wholesale or retail customers or groups of customers discontinuing use of the Systems and leading to a Material decrease in gross revenue	e.g. POA00174802, POA00002851 Search ongoing	The listed documents include OHM's CIP and the Conway MacKenzie presentations. The CIP only references the departure of Flint/Genesee County. Otherwise, these documents are not responsive.	Individuals and classes moving out of the Systems impacts future revenues, which needs to be considered in any financial analysis.
15	Number of customer accounts by customer rate class for FY 2009-2013 and projections for FY 2014-2023		No documents provided	This will show existing and future revenues and growth by class to validate current revenues and calculate accurate projected revenues.
18	Current and projected optimal employee headcounts	POA00245352, POA00245393, POA00245432, POA00245468, POA00245504, POA00245542, POA00245582, POA00245620, POA00245656, POA00245693, POA00214164, POA00216881, POA00216883, POA00216877, POA00216884, POA0072756, POA00034480, POA00216881, POA00002851, POA00107044	POA 00034480 regards alternatives for the parking system. POA0072756 was withheld on the basis of privilege. Aside from employee headcount assumptions contained in the Model, CM Report, and filings, no information is included on optimal employee headcount.	Labor is the largest operating expense and impacts financial analysis. Projections as to further decreases in employee headcount may further impact such analysis.
19	Documents cataloging System assets and any monetization of the Systems	POA00245352, POA00245393, POA00245432, POA00245468, POA00245504, POA00245542, POA00245582, POA00245620, POA00245656, POA00245693, POA00214164, POA00216881, POA00216883, POA00216877, POA00216884, POA0072756, POA00034480, POA00216881, POA00002851, POA00107044	POA 00034480 regards alternatives for the parking system. POA0072756 was withheld on the basis of privilege. Aside from public filings, none of these address specific System assets.	Information related to depreciation and capital expenditures will allow experts to validate the maintenance estimates.
20	Calculation and allocation of all pensions, OPEB, and any COPs-related payments assessed against the Systems historically and that are projected through any projection period under the Plan	Forthcoming in E&Y "binder" production, POA00258647-POA00261019, POA00262497-POA00262531	The E&Y "binder" has not been provided. These documents do not include historical data regarding the allocation of pension, OPEBs or COPs-related expenses to specific funds. POA00257425 provides an allocation of the funds derived from the issuance of the COPs, and other documents set forth Milliman's projections.	Historical information will be used to determine whether Plan and projection allocations are consistent with past practices.
23	Calculation of the GRS OPEB Claims as shown in the disclosure statement	Data room and e.g. POA00221713, POA00221757, POA00221628, POA00221580, POA00221670, POA00221261, POA00221802, POA00221533, POA00221411, POA00221212, POA00221310, POA00221360, POA00221542, POA00258647-POA00261019, POA00262497-POA00262531	Included in this set are the historical audits of PFRS and GRS. POA00260664 provides support for the projected DWSD retiree healthcare plan. None of the documents address the calculation of OPEB Claims as shown in the disclosure statement.	This allows parties to determine whether the amount has been properly measured.
24	Total amount of the GRS's OPEB Claims paid or projected to be paid from the Petition Date to the Effective Date	Data room and e.g. POA00221713, POA00221757, POA00221628, POA00221580, POA00221670, POA00221261, POA00221802, POA00221533, POA00221411, POA00221212, POA00221310, POA00221360, POA00221542, POA00258647-POA00261019, POA00262497-POA00262531	Included in this set are the historical audits of PFRS and GRS. POA00260664 provides support for the projected DWSD retiree healthcare plan. None of the documents address the OPEB Claims paid or projected to be paid between the Petition Date and the Effective Date.	This allows parties to determine whether the amount has been properly measured.

\*Requests on this page were highlighted as priority items by the DWSD Trustee and the Ad Hoc Committee. Yellow requests also were highlighted by the DWSD Parties as priority.

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27	Any Material Capital Expenditures to be funded after FY 2024	POA00245352, POA00245393, POA00245432, POA00245468, POA00245504, POA00245542, POA00245582, POA00245620, POA00245656, POA00245693, POA00214164, POA00216881, POA00216883, POA00216877, POA00216884, POA0072756, POA00034480, POA00216881, POA00002851, POA00107044	POA 00034480 regards alternatives for the parking system. POA0072756 was withheld on the basis of privilege. The documents provided include OHM's CIP, which is for FY 2013-2024. There are no documents responsive to this request.	Future capital needs beyond the projected 10 years in the Plan may impact the financial viability of the Systems going forward.
29	DWSD hardship exemptions with the EPA or Michigan Dept. of Environmental Quality		No documents provided	This will show what financial capacity analysis was completed by the City, provide information on affordability, and assist with Capital Expenditure profiling based upon what the EPA has agreed to with the City.
35 / 57	Rate-setting agreements and negotiations with all municipal counterparts	Search ongoing	No documents provided	The departure of certain customers from the Systems would have a material adverse effect on revenue. Therefore, an understanding of the current commitments and the current dynamics and dialogue with counties on a year-to-year contract is crucial.
36	Prospect of forming or plan to form any regional authority or private enterprise to operate, manage, and/or own the Systems	Some production and Search ongoing	No documents provided	Proposals may highlight operational inefficiencies or projection anomalies.
55	Documents made available to parties participating in the Request for Proposal for Underwriting Services	No response	No documents provided	Term sheets may provide data points in determining whether the interest rate reset was calculated appropriately.

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